

APR 26 2021
JULIA C DUNN CLERK
BY DEPUTY CLERK

United States District Court
for the Western District of Virginia
Charlottesville Division
Sines, et al., Plaintiffs vs. Kessler, et al., Defendants
Civil Action No. 3:17-cv-00072-NKM

Supplemental to Defendants Motion to Sanction Plaintiffs

By Defendant Christopher Cantwell

Following the recent revelation that the Plaintiffs in this case have selectively withheld documents, correspondence, filings, and evidence from me for the last 14 months, I received a 2 terabyte encrypted hard drive from Plaintiffs' counsel (which purports to contain what was previously kept from me).

Shortly after this, I received this Court's Memorandum Opinion regarding my co-defendants' motion to exclude some outrageous "heyday" testimony.

Together, they provide an excellent example of the harm done to my defense by Plaintiffs' misconduct and, in the event I am unsuccessful in my efforts to be dismissed from this abuse of process, will necessitate other relief from the Court.

Given the severe constraints placed on me by my unrelated incarceration, it will be some time before I can even fully understand the implications. I am lucky to get one hour a day in front of a computer here, and in addition to the 14 months of catching up I must do, the Court's decision to admit this so-called "expert" testimony has fundamentally altered the burden of proof in this case, and with it, the strategy on which my defense had to this point relied.

The Plaintiffs' supposed "experts" intend to tell the jury that "White Supremacists" lie and that the Defendants are "White Supremacists". While the Plaintiffs have assured the Court that these "experts" will not call any particular witness a liar, it bodes on comedic to pretend the implication is not obvious to anyone having attained a first grade education. Calling our claims of self defense "double speak" and our entertainment products a "just kidding strategy", does not just "imply" that we are lying, it says so outright.

For me in particular, being a professional entertainer who was compelled to defend himself against Plaintiffs' co-conspirators,

this burden shifting is particularly profound.

My co-defendants pointed out that the use of the term "White Supremacist Movement" was an attempt to short circuit the legal definition of Conspiracy. The Plaintiffs and the Court respond by saying the Plaintiffs still bear the burden of proving that each defendant entered into an agreement to commit racially motivated violence. The slight of hand, however, is the testimony that everything "White Supremacists" do is violent and racially motivated, and that our entirely prudent discussions of self defense and the Virginia law revolving around that subject, constitute the unlawful conspiracy. The defendants are then left with the unenviable task of justifying perfectly legal activity, after having been called a bunch of racist liars by a supposed authority on violent, racist liars.

At a bare minimum, I'd need additional time to procure an expert of my own to rebut this absurdity. I do not have access to a phone book much less an internet search, and I can barely afford the paper I'm writing this on. Much less be an expert witness.

This also increases the burden on Defendants such as myself to prove that we had good reason to fear violence from Plaintiffs and their co-conspirators. From my perspective, this warrants discovery demands which I had previously thought would be unworthy of the effort.

I would, for example, seek deposition and communications records from Kristopher Goad, Emily Gorcenski, Thomas Marrey, Thomas Keenan, Mike Longo Jr., and Lindsay Elizabeth Moers. That discovery would yield the names of other co-conspirators who would need to be similarly probed.

It is my understanding that discovery deadlines either have expired or will imminentl expire, and I do not think the Plaintiffs should be granted additional time to pester the Defendants with discovery demands which they know full well have no hope of proving the falsehoods on which this lawsuit rests, as a reward for their own misconduct of withholding materials from me.

At this time I mean ONLY to provide this in furtherance of my motion to sanction Plaintiffs by dismissing their claims against me, and to inform the court of where I stand. Accordingly, to whatever extent legally applicable, I reserve the right to file separate motions to exclude, to extend deadlines, to seek discovery, call witnesses, and seek dismissal or summary judgement.

Respectfully Submitted,

Christopher Cantwell - Defendant - Pro Se
- C Cantwell 4-21-2021

Christopher Lantrell
Bukins #20-00348
226 County Farm Rd.
Lover, NH 03820
Craftford D.O.C.

MANCHESTER NH 030
22 APR 2021 PM 3 FOREVER
USA

Barn Swallow



Office of the Clerk
U.S. District Court for the
Western District of Virginia
Charlottesville Division
255 West Main Street Room 304
Charlottesville, VA 22902
22902-505879